

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

3000 SMITH, LTD

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§
§

CHAPTER 11

DEBTOR

CASE NO. 25-31240

EMERGENCY MOTION FOR RELIEF FROM THE AUTOMATIC STAY

THIS IS A MOTION FOR RELIEF FROM THE AUTOMATIC STAY. IF IT IS GRANTED THE MOVANT MAY ACT OUTSIDE OF THE BANKRUPTCY PROCESS. IF YOU DO NOT WANT THE STAY LIFTED, IMMEDIATELY CONTACT THE MOVING PARTY TO SETTLE. IF YOU CANNOT SETTLE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY AT LEAST 7 DAYS BEFORE THE HEARING. IF YOU CANNOT SETTLE, YOU MUST ATTEND THE HEARING. EVIDENCE MAY BE OFFERED AT THE HEARING AND THE COURT MAY RULE.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

NATURE OF EMERGENCY

Emergency relief is requested on the grounds that insurance has lapsed on the subject property.

1. Movant: MMG Investments V, LLC
2. Movant holds a first lien Deed of Trust and Security Agreement in certain real property located in Harris County, Texas (the "Property") and more particularly described as:

See attached **Exhibit B**, attached hereto.¹

3. 3000 Smith, LTD ("Debtor") filed this bankruptcy on March 4, 2025.

¹ The Note, Deed of Trust and Security Agreement and Assignment of Deed of Trust and Security Agreement are attached hereto as **Exhibits A, B and C**, respectively. A pay history is attached as **Exhibit D**.

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|-----|--|---|
| 4. | Type of collateral: | Real Property |
| 5. | Debtor's scheduled value of property: | No Schedules have been filed to date. |
| 6. | Movant's estimated value of property: | \$2.9 million |
| 7. | Total amount owed to Movant: | \$2,794,170.51 plus additional interest, force placed insurance and attorneys' fees |
| 8. | Estimated equity: | \$106,000.00 |
| 9. | Total pre- and post-petition arrearages: | \$2,794,170.51 plus accrued interest, force placed insurance and attorneys' fees. |
| 10. | Total post-petition arrearages: | Obligation has matured |
| 11. | Amount of unpaid, past due property taxes, if applicable (2024): | \$57,824.65 |
| 12. | Expiration date on insurance policy, if applicable | Insurance has lapsed |
| 13. | Cause exists to terminate the automatic stay | Insurance has lapsed |

WHEREFORE, Movant requests that the Court grant this Motion and award such other and further relief to which it may be entitled.

Date: April 1, 2025

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Michael P. Ridulfo
Michael P. Ridulfo
State Bar No. 16902020
SDTX No. 27086
mridulfo@krcl.com
5151 San Felipe, Suite 800
Houston, Texas 77056
(713) 425-7400 (Telephone)
(713) 425-7700 (Facsimile)
ATTORNEY FOR MOVANT

CERTIFICATE OF CONFERENCE

By emails dated March 17, 25 and 26, 2025, the undersigned contacted Debtor's counsel and requested proof of insurance. To date, no proof of insurance has been provided.

/s/ Michael P. Ridulfo
Michael P. Ridulfo

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 1, 2025, a true and correct copy of the foregoing document was served via ECF and regular mail on parties listed on the attached mailing matrix.

/s/Michael P. Ridulfo
Michael P. Ridulfo

Label Matrix for local noticing
0541-4
Case 25-31240
Southern District of Texas
Houston
Tue Apr 1 09:43:35 CDT 2025

(p)HARRIS COUNTY ATTORNEY'S OFFICE
P O BOX 2848
HOUSTON TX 77252-2848

3000 Smith, Ltd
3000 Smith St
Houston, TX 77006-3441

Houston Community College System
Linebarger Goggan Blair & Sampson LLP
c/o Jeannie Lee Andresen
PO Box 3064
Houston, TX 77253-3064

City of Houston
Linebarger Goggan Blair & Sampson LLP
Jeannie Lee Andresen
PO Box 3064
Houston, TX 77253-3064

4
United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

City Of Houston Public Works
Po Box 4863
Houston, TX 77210-4863

Houston ISD
Linebarger Goggan Blair & Sampson LLP
c/o Jeannie Lee Andresen
PO Box 3064
Houston, TX 77253-3064

City of Houston
c/o Jeannie L. Andresen
Linebarger Goggan Blair & Sampson LLP
PO Box 3064
Houston, TX 77253-3064

City of Houston/ Harris County
1301 Travis Street Suite 145
Houston, TX 77002-7429

Houston Community College System
c/o Jeannie L. Andresen
Linebarger Goggan Blair & Sampson LLP
PO Box 3064
Houston, TX 77253-3064

Houston ISD
c/o Jeannie L. Andresen
Linebarger Goggan Blair & Sampson LLP
PO Box 3064
Houston, TX 77253-3064

Houston Independent School District
P.O. Box 4668
Houston, TX 77210-4668

Internal Revenue Service
Centralized Insolvency Operations
Po Box 7346
Philadelphia, PA 19101-7346

MMG Investments V, LLC
c/o Kane Russell Coleman Logan, PC
5151 San Felipe St Ste 800
Houston, TX 77056-3627

Matthew Ogurick
7 Times Sq
New York, NY 10036-6524

Midtown Management District
P.O.Box 73109
Houston, TX 77273-3109

Nalin Kumar
c/o Jarrod Martin
Chamberlain Hrdlick
1200 Smith St Ste 1400
Houston, TX 77002-4496

Nextfund CCP Ventures, LLC
Attn: Mattew Ogurick
7 Times Sq
New York, NY 10036-6524

Small Business Administration
P.O. Box 3918
Portland, OR 97208-3918

TXU Electric/TXU Energy
Attention: Bankruptcy
Po Box 650764
Dallas, TX 75265-0764

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Zion Janitorial
2040 Louetta Rd F
Spring, TX 77388-4774

Danielle L. Fridge
c/o The Probus Law Firm
10497 Town and Country Way, Suite 930
Houston, TX 77024-1119

Nalin Kumar
c/o Chamberlain Hrdlicka
Attn: Bankruptcy Department
1200 Smith Street
Suite 1400
Houston, TX 77002-4496

Reese W Baker
Baker & Associates
950 Echo Lane
Suite 300
Houston, TX 77024-2824

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Harris County, ATTN: Property Tax Division
Harris County Attorney's Office
P.O. Box 2848
Houston, TX 77252 United States

(d)Harris County, et al
P.O. Box 2848
Houston, TX 77252

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)MMG Investments V, LLC

(u)Midtown Management District
c/o Perdue Brandon

End of Label Matrix	
Mailable recipients	25
Bypassed recipients	2
Total	27